

U.S. DISTRICT COURT – N.D. OF N.Y.

FILED

Apr 09 - 2025

John M. Domurad, Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

## **UNITED STATES OF AMERICA**

v.

### **Defendants.**

## **THE GRAND JURY CHARGES:**

**COUNT 1**  
**[Conspiracy to Commit Alien Smuggling]**

Between on or about December 1, 2022 and on or about April 9, 2025, in Clinton and Franklin Counties in the Northern District of New York, and elsewhere, the defendants,

SAMUEL DIAZ-PEREZ,

and others, conspired to commit alien smuggling by, knowing that one or more persons were aliens, bringing and attempting to bring to the United States in any manner whatsoever such persons at a place other than a designated port of entry, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and (v)(I).

**COUNTS 2 - 26**  
**[Alien Smuggling]**

On or about the following dates, in the following counties in the Northern District of New York, the defendants,

**SAMUEL DIAZ-PEREZ,**

knowing and in reckless disregard of the fact that aliens believed to have the following initials had not received prior official authorization to come to, enter, and reside in the United States, brought to the United States in any manner whatsoever, such aliens:

Count	Dates	County	Alien's Initials
2	August 1 through August 31, 2022	Clinton	C.R.-M.
3	December 31, 2022	Clinton	G.R.-R.
4	March 1 through March 31, 2023	Clinton	E.J.-V.
5	April 30, 2023	Franklin	G.T.-P.
6	April 30, 2023	Franklin	C.M.-S.
7	April 30, 2023	Franklin	V.A.-H.
8	April 30, 2023	Franklin	M.G.-H.
9	April 30, 2023	Franklin	J.G.-L.
10	April 30, 2023	Franklin	A.G.-S.
11	April 30, 2023	Franklin	M.H.-L.
12	May 28, 2023	Clinton	R.B.-A.
13	May 28, 2023	Clinton	A.J.-J.
14	May 28, 2023	Clinton	J.M.-T.
15	May 28, 2023	Clinton	G.V.-A.
16	July 14, 2023	Clinton	C.R.-A.
17	July 14, 2023	Clinton	A.N.-C.
18	July 24, 2023	Clinton	D.P.-A.

19	July 24, 2023	Clinton	S.R.-M.
20	July 24, 2023	Clinton	Y.P.-H.
21	August 12, 2023	Clinton	D.B.-G.
22	August 12, 2023	Clinton	D.C.-C.
23	August 12, 2023	Clinton	L.C.-C.
24	August 12, 2023	Clinton	A.M.-V.
25	August 12, 2023	Clinton	L.Q.-L.
26	August 12, 2023	Clinton	J.R.-M.

all in violation of Title 8, United States Code, Section 1324(a)(2). Counts 2 through 26 were done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Counts 2 and 3 were the defendants' first and second violations of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B). Counts 4 through 26 were the defendants' third through twenty-fifth violations of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

Dated: April 9, 2025

A TRUE BILL,

\*name redacted

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Grand Jury Foreperson

JOHN A. SARCONE III  
United States Attorney

By:

Carling M. Dunham  
Carling Dunham  
Assistant United States Attorney  
Bar Roll No. 703858

MATTHEW R. GALEOTTI  
Head of the Justice Department's  
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By:

Jenna Reed  
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Trial Attorney  
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